

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
SHARI L. KAUFMAN  
3 Assistant Federal Public Defender  
State Bar No. 004461  
4 411 E. Bonneville Avenue, Suite 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577  
(Fax) 388-6261  
6 Attorneys for Rocco Lazazzaro  
7  
8

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 \* \* \*

12  
13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 vs.  
16 ROCCO LAZAZZARO,  
17 Defendant.

2:12-cr-00485-GMN-PAL

**STIPULATION TO CONTINUE**  
**MOTION HEARING**  
**(First Request)**  
**(Emergency Consideration Requested)**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United  
19 States Attorney, and Christina M. Brown, Assistant United States Attorney, counsel for the United  
20 States of America, and Rene L. Valladares, Federal Public Defender, and Shari L. Kaufman,  
21 Assistant Federal Public Defender, counsel for defendant ROCCO LAZAZZARO, that the Motion  
22 hearing currently scheduled for March 25, 2013, at the hour of 10:00 a.m., be vacated and set to any  
23 day next week; however, in no event earlier than Tuesday, March 26, 2013.

24 This Stipulation is entered into for the following reasons:

- 25 1. Defense counsel will be out of the office on an office mandated furlough day  
26 during the presently scheduled hearing date and time.  
27 2. Additionally, defense counsel is the attorney who has specific knowledge  
28 of the case and respectfully requests a resetting of the motion hearing in this matter.

1           3.           The defendant Lazazzaro is incarcerated does not object to the continuance.

2           4.           The parties agree to the continuance.

3           5.           The additional time requested herein is not sought for purposes of delay, but  
4 merely to allow for a resetting in this matter.

5           6.           Additionally, denial of this request for continuance could result in a  
6 miscarriage of justice.

7           7.           The additional time requested by this Stipulation is excludable in computing  
8 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,  
9 United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States  
10 Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

11                 This is the first request to continue the motion hearing date filed herein.

12                 DATED this 21<sup>st</sup> day of March, 2013.

13           RENE L. VALLADARES  
14           Federal Public Defender

              DANIEL BOGDEN  
              United States of America

15                 /s/ Shari L. Kaufman  
16 By: \_\_\_\_\_  
17           SHARI L. KAUFMAN  
              Assistant Federal Public Defender  
              Counsel for Rocco Lazazzaro

              /s/ Christina M. Brown  
By: \_\_\_\_\_  
              CHRISTINA M. BROWN  
              Assistant United States Attorney  
              Counsel for the Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROCCO LAZAZZARO,

Defendant.

2:12-cr-00485-GMN-PAL

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore,  
IT IS THEREFORE ORDERED that the motion hearing currently scheduled for Monday,  
March 25, 2013, at the hour of 10:00 a.m., be vacated and continued to Thursday, 3/28/2013  
at the hour of 9:00am

DATED 14 day of March, 2013.

  
UNITED STATES MAGISTRATE JUDGE